

3. K.A.R. 82-3-120(a)(1) provides that no operator shall drill, complete, service, plug, or operate any oil or gas well without first obtaining or renewing an operator license, and that each operator in physical control of any such well shall maintain a current license even if the

well is shut in or idle. K.A.R. 82-3-120(a)(2) provides that each licensee shall annually submit a completed license renewal form on or before the expiration date of the current license.

4. K.A.R. 82-3-120(k) provides that failure to obtain or renew an operator license before operating shall be punishable by a \$500 penalty.

II. FINDINGS OF FACT

5. On May 30, 2025, Operator's license expired. Operator is responsible for the wells (Subject Well(s)) identified in Exhibit A.

6. On June 5, 2025, Commission Staff sent a letter to Operator, requiring Operator to renew the license, transfer the Subject Well(s) to another operator, or plug the Subject Well(s), by June 19, 2025.¹ To date, Operator has not complied with Staff's letter.

III. CONCLUSIONS OF LAW

7. The Commission has jurisdiction over Operator and this matter under K.S.A. 74-623 and K.S.A. 55-152.

8. Operator has committed one violation of K.A.R. 82-3-120(a) because Operator remains responsible for the Subject Well(s), and Operator's license is expired.

THEREFORE, THE COMMISSION ORDERS:

- A. Operator shall pay a \$500 penalty.
- B. Operator shall immediately shut-in all unplugged wells on its license, and cease oil and gas operations, until Operator is in compliance with this Order.
- C. Operator has 30 days from the date of this Order to:
 - a. Renew its license or obtain a new license and transfer the Subject Well(s) to that license; or

¹ Exhibit A.

- b. Transfer the Subject Well(s) to another operator by filing the appropriate forms with the Commission; or
- c. Plug the Subject Well(s).

D. If any unplugged wells remain on Operator's expired license after 60 days from the date of this Order, then:

- a. Operator shall pay an additional \$5,000 penalty;
- b. Staff shall revoke any injection authorizations applicable to Operator; and
- c. Staff is directed to place the wells on the appropriate state plugging list, to plug according to priority and as funds allow, and to assess the plugging costs to Operator. This shall not preclude Staff from investigating additional potentially responsible parties.

E. Operator may request a hearing on the above issues by submitting a written request, pursuant to K.S.A. 55-164, K.S.A. 77-537, and K.S.A. 77-542, to the Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202, within 30 days from the date of service of this Order. A request for hearing must comply with K.A.R. 82-1-219.

F. Failure to timely request a hearing will result in a waiver of Operator's right to a hearing. If no party timely requests a hearing, then this Order shall become final. If Operator is not in compliance with this Order and the Order is final, then Operator's license shall be suspended without further notice, shall remain suspended until Operator complies, and Staff may seal the wells on Operator's license until Operator is in compliance. The notice and opportunity for a hearing on this Order shall constitute the notice required by K.S.A. 77-512 regarding

license suspension. A party may petition for reconsideration of a final order pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).²

G. Credit card payments may be made by calling the Conservation Division at 316-337-6200. Checks and money orders shall be payable to the Kansas Corporation Commission. Payments shall be mailed to the Kansas Corporation Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202. Payments must reference the docket number of this proceeding.

BY THE COMMISSION IT IS SO ORDERED.

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 07/03/2025



Celeste Cheney-Tucker
Executive Director

Mailed Date: 07/03/2025

KAM

² See K.S.A. 55-162; K.S.A. 55-164; K.S.A. 55-606; K.S.A. 55-707; K.S.A. 77-503(c); K.S.A. 77-531(b).

NOTICE OF VIOLATION

June 5, 2025

Randy Peterson
L & G Petroleum Operating, LLC
2663 CR 1780
HAVANA, KS 67347

Re: Unplugged Well(s) on Expired License #32851

Operator:

Unplugged well(s) are on your expired license, **which violates K.A.R. 82-3-120**. Attached is a list of the unplugged well(s). Please do one of the following:

- Renew your license, or obtain a new license and transfer the well(s) to that license,
- Transfer the well(s) to another operator by filing T-1 forms with the Commission, or
- File Well Plugging Application (CP-1) form(s) and plug the well(s).

Your deadline is June 19, 2025.

If you do not correct this violation, I will recommend a Commission Order with a \$500 penalty. The Order would also require you to plug the well(s) within 60 days. Failure to comply with the Order would automatically result in the Commission levying additional penalties against you, directing Staff to plug the wells, and assessing plugging costs to you.

You must immediately shut-in all wells and cease oil and gas operations until compliance is achieved.

For help renewing or obtaining a license, contact Nancy Borst at 316-337-6200.

For help transferring wells, contact Deanna Garrison at 316-337-6209.

For help with CP-1 forms, contact CeLena Peterson at 316-337-6035.

If you have further questions, you may contact me by calling our main number at the top of this letter.

Sincerely,

Nancy D. Borst
Licensing Department

Exhibit A

L & G Petroleum Operating, LLC License: 32851

<u>Unplugged Wells on Operator's License</u>				
API Well #	Lease Name / Well #		Well Location	County
15-001-01790-00-01	BOWLUS B	12 RA	4-24S-18E, SESWSE	ALLEN
15-001-02110-00-00	WEST RIGGS	9F	9-24S-18E, NWSWNE	ALLEN
15-001-02112-00-00	WEST RIGGS	14D	9-24S-18E, S2N2NE	ALLEN
15-001-02113-00-00	WEST RIGGS	14E	9-24S-18E, NWSENE	ALLEN
15-001-02114-00-00	WEST RIGGS	15G	9-24S-18E, NWSENE	ALLEN
15-001-02115-00-00	WEST RIGGS	17E	9-24S-18E, SENENE	ALLEN
15-001-02116-00-00	WEST RIGGS	16FA	9-24S-18E, NWSENE	ALLEN
15-001-02117-00-00	WEST RIGGS	16FB	9-24S-18E, NESENE	ALLEN
15-001-02143-00-00	CLINKENBEARD	4	3-24S-18E, SWSESE	ALLEN
15-001-02144-00-00	CLINKENBEARD	5	3-24S-18E, NESESE	ALLEN
15-001-02145-00-00	CLINKENBEARD	6	3-24S-18E, NESESE	ALLEN
15-001-02146-00-00	CLINKENBEARD	12AO	3-24S-18E, SESESE	ALLEN
15-001-02147-00-00	CROSS	11R	3-24S-18E, SESWSE	ALLEN
15-001-02148-00-00	CROSS	12R	3-24S-18E, SESWSE	ALLEN
15-001-02155-00-00	BOWLUS B	10R	4-24S-18E, SWSWSE	ALLEN
15-001-02156-00-00	BOWLUS B	14R	4-24S-18E, SESWSE	ALLEN
15-001-02157-00-00	BOWLUS B	12R	4-24S-18E, SESWSE	ALLEN
15-001-02158-00-00	BOWLUS B	11R	4-24S-18E, SESWSE	ALLEN
15-001-02159-00-00	BOWLUS B	9A	4-24S-18E, SWSWSE	ALLEN
15-001-02160-00-00	THORNTON	16J	9-24S-18E, NWNESE	ALLEN
15-001-02161-00-00	THORNTON	18J	9-24S-18E, NENESE	ALLEN
15-001-02162-00-00	THORNTON	18R	9-24S-18E, SESESE	ALLEN
15-001-02163-00-00	THORNTON	18P	9-24S-18E, NESESE	ALLEN
15-001-02164-00-00	THORNTON	18L	9-24S-18E, NENESE	ALLEN
15-001-02177-00-00	EAST RIGGS	6G	10-24S-18E, S2NWSWSE	ALLEN
15-001-02178-00-00	EAST RIGGS	6D	10-24S-18E, SWNENW	ALLEN
15-001-02179-00-00	EAST RIGGS	7C	10-24S-18E, SWNENENW	ALLEN

15-001-02180-00-00	EAST RIGGS	6BA	10-24S-18E, NWNENW	ALLEN
15-001-02181-00-00	EAST RIGGS	4C	10-24S-18E, NENWNW	ALLEN
15-001-02182-00-00	GREGG	11BA	10-24S-18E, NENWNE	ALLEN
15-001-02183-00-00	GREGG	14B	10-24S-18E, NWNENE	ALLEN
15-001-02184-00-00	GREGG	11C	10-24S-18E, NESENE	ALLEN
15-001-02185-00-00	GREGG	18BA	10-24S-18E, NWNENE	ALLEN
15-001-02186-00-00	GREGG	11B	10-24S-18E, NWNWNE	ALLEN
15-001-02195-00-00	BOWLUS A	11J	15-24S-18E, NWNWSE	ALLEN
15-001-02196-00-00	BOWLUS A	10M	15-24S-18E, NWNWSE	ALLEN
15-001-02197-00-00	BOWLUS A	10N	15-24S-18E, SWNWSE	ALLEN
15-001-02199-00-00	BOWLUS A	10K	15-24S-18E, NWNWSE	ALLEN
15-001-02200-00-00	BOWLUS A	9Q	15-24S-18E, NWSWSE	ALLEN
15-001-03195-00-00	WEST RIGGS	16 F	9-24S-18E, SENWSENE	ALLEN
15-001-19068-00-00	CLINKENBEARD	1-A	3-24S-18E, SWSESE	ALLEN
15-001-19078-00-00	CLINKENBEARD	2-A	3-24S-18E, SWSESE	ALLEN
15-001-19092-00-00	CLINKENBEARD	7AO	3-24S-18E, SESESE	ALLEN
15-001-19100-00-00	CLINKENBEARD	4A	3-24S-18E, SWNESE	ALLEN
15-001-19101-00-00	CLINKENBEARD	5 A	3-24S-18E, SESESE	ALLEN
15-001-19102-00-00	CLINKENBEARD	10AO	3-24S-18E, NWSESE	ALLEN
15-001-19103-00-00	CLINKENBEARD	11AO	3-24S-18E, NWSESE	ALLEN
15-001-19125-00-00	CLINKENBEARD	3A	3-24S-18E, SWSESE	ALLEN
15-001-19146-00-00	BOWLUS B	10	4-24S-18E, SWSWSE	ALLEN
15-001-19188-00-00	WEST RIGGS	16 G	9-24S-18E, NWSENE	ALLEN
15-001-19189-00-00	WEST RIGGS	17 B	9-24S-18E, NENENE	ALLEN
15-001-19197-00-00	THORTON	15R9	9-24S-18E, SWSESE	ALLEN
15-001-19207-00-00	GREGG	18B	10-24S-18E, NENENE	ALLEN
15-001-19229-00-00	GREGG	15 A (5)	10-24S-18E, NWNENE	ALLEN
15-001-19234-00-00	GREGG	16 B (9)	10-24S-18E, NENENE	ALLEN
15-001-20354-00-00	EAST RIGGS	1G	10-24S-18E, NWSWSWNW	ALLEN
15-001-20355-00-00	RIGGS EAST	1-H	10-24S-18E, SWSWSWNW	ALLEN
15-001-20357-00-00	RIGGS EAST	2H	10-24S-18E, SESWSWNW	ALLEN
15-001-20358-00-01	RIGGS	A 1 G	10-24S-18E, SWSWNW	ALLEN
15-001-20359-00-00	RIGGS EAST	2G	10-24S-18E, SWSWNW	ALLEN
15-001-20458-00-00	EAST RIGGS	1-GH	10-24S-18E, NWSWSWNW	ALLEN
15-001-20712-00-00	CLINKENBEARD	14	3-24S-18E, SWSESE	ALLEN
15-001-21073-00-00	CLINKENBEARD	15	3-24S-18E, SWSESE	ALLEN
15-001-21074-00-00	CLINKENBEARD	16	3-24S-18E, NWSESE	ALLEN
15-001-21075-00-00	CLINKENBEARD	18	3-24S-18E, SESESE	ALLEN
15-001-21076-00-00	CLINKENBEARD	17	3-24S-18E, SWSESE	ALLEN
15-001-21367-00-02	WEST RIGGS	20	9-24S-18E, NWSENENE	ALLEN

15-001-21368-00-00	WEST RIGGS	21	9-24S-18E, NESWNENE	ALLEN
15-001-21370-00-00	WEST RIGGS	22	9-24S-18E, NESENWNE	ALLEN
15-001-21371-00-00	WEST RIGGS	23	9-24S-18E, NWSENWNE	ALLEN
15-001-21372-00-00	WEST RIGGS	24	9-24S-18E, NWSWNWNE	ALLEN
15-001-21373-00-02	WEST RIGGS	25	9-24S-18E, E2SENE	ALLEN
15-001-21374-00-02	WEST RIGGS	26	9-24S-18E, S2NENE	ALLEN
15-001-21376-00-00	WEST RIGGS	28	9-24S-18E, NWSENWNE	ALLEN
15-001-21377-00-00	WEST RIGGS	29	9-24S-18E, NESWNWNE	ALLEN
15-001-21378-00-02	WEST RIGGS	30	9-24S-18E, SWSENE	ALLEN
15-001-21379-00-00	WEST RIGGS	31	9-24S-18E, SESWNENE	ALLEN
15-001-21380-00-00	WEST RIGGS	32	9-24S-18E, SESENWNE	ALLEN
15-001-21381-00-00	WEST RIGGS	33	9-24S-18E, SESWNWNE	ALLEN
15-001-21382-00-00	WEST RIGGS	34	9-24S-18E, SWSWNWNE	ALLEN
15-001-21383-00-02	WEST RIGGS	35	9-24S-18E, NENESENE	ALLEN
15-001-21384-00-02	WEST RIGGS	36	9-24S-18E, N2N2SENE	ALLEN
15-001-21385-00-00	WEST RIGGS	37	9-24S-18E, NWNWSENE	ALLEN
15-001-21386-00-00	WEST RIGGS	38	9-24S-18E, SWNESWNE	ALLEN
15-001-21387-00-00	WEST RIGGS	39	9-24S-18E, NENWSWNE	ALLEN
15-001-21388-00-00	WEST RIGGS	40	9-24S-18E, SWNESENE	ALLEN
15-001-21389-00-00	WEST RIGGS	41	9-24S-18E, SENWSENE	ALLEN
15-001-21390-00-00	WEST RIGGS	42	9-24S-18E, SENESWNE	ALLEN
15-001-21391-00-00	WEST RIGGS	43	9-24S-18E, SWNESWNE	ALLEN
15-001-21392-00-00	WEST RIGGS	44	9-24S-18E, SWNWSWNE	ALLEN
15-001-21393-00-00	WEST RIGGS	45	9-24S-18E, SENE	ALLEN
15-001-21394-00-00	WEST RIGGS	46	9-24S-18E, NENE	ALLEN
15-001-21395-00-00	WEST RIGGS	47	9-24S-18E, SENE	ALLEN
15-001-21396-00-00	WEST RIGGS	48	9-24S-18E, SWNE	ALLEN
15-001-21397-00-00	WEST RIGGS	49	9-24S-18E, SWNE	ALLEN
15-001-21398-00-00	WEST RIGGS	50	9-24S-18E, NWSESENE	ALLEN
15-001-21399-00-00	WEST RIGGS	51	9-24S-18E, NESWSENE	ALLEN
15-001-21400-00-00	WEST RIGGS	52	9-24S-18E, NESESWNE	ALLEN
15-001-21401-00-00	WEST RIGGS	53	9-24S-18E, NWSESWNE	ALLEN
15-001-21402-00-00	WEST RIGGS	54	9-24S-18E, NWSWSWNE	ALLEN
15-001-21403-00-00	WEST RIGGS	55	9-24S-18E, SESESENE	ALLEN
15-001-21404-00-00	WEST RIGGS	56	9-24S-18E, SENE	ALLEN
15-001-21405-00-00	WEST RIGGS	57	9-24S-18E, SWSWSENE	ALLEN
15-001-21406-00-00	WEST RIGGS	58	9-24S-18E, SWSESWNE	ALLEN
15-001-21407-00-00	WEST RIGGS	59	9-24S-18E, SESWSWNE	ALLEN
15-001-22916-00-00	BOWLUS A	12-K	15-24S-18E, NWNWSE	ALLEN
15-001-26286-00-00	WEST RIGGS	27-B	9-24S-18E, SESENWNE	ALLEN

15-001-26495-00-00	WEST RIGGS	77	9-24S-18E, SWNWNENE	ALLEN
15-001-26659-00-00	WEST RIGGS	21-B	9-24S-18E, NWSWNENE	ALLEN
15-001-26660-00-00	WEST RIGGS	22-B	9-24S-18E, SENWNE	ALLEN
15-001-26661-00-00	WEST RIGGS	31-B	9-24S-18E, SWSWNENE	ALLEN
15-001-26662-00-00	WEST RIGGS	71	9-24S-18E, NENWNENE	ALLEN
15-001-26663-00-00	WEST RIGGS	76	9-24S-18E, SWNENENE	ALLEN
15-001-26760-00-02	WEST RIGGS	20B	9-24S-18E, NWSENE	ALLEN
15-001-26761-00-00	WEST RIGGS	32B	9-24S-18E, SENENE	ALLEN
15-001-26762-00-02	WEST RIGGS	70	9-24S-18E, NWNENENE	ALLEN
15-001-26763-00-00	WEST RIGGS	75	9-24S-18E, SENENENE	ALLEN
15-001-26776-00-00	WEST RIGGS	37-B	9-24S-18E, NESWNE	ALLEN
15-001-26777-00-00	WEST RIGGS	50-B	9-24S-18E, SESENE	ALLEN
15-001-26778-00-00	WEST RIGGS	76-B	9-24S-18E, NWNENE	ALLEN
15-001-27018-00-02	WEST RIGGS	20A	9-24S-18E, NESENE	ALLEN
15-001-27019-00-00	WEST RIGGS	26-B	9-24S-18E, SESWNENE	ALLEN
15-001-27020-00-02	WEST RIGGS	70B	9-24S-18E, NENWNENE	ALLEN
15-001-27021-00-00	WEST RIGGS	71-B	9-24S-18E, NWNENE	ALLEN
15-001-27022-00-02	WEST RIGGS	75B	9-24S-18E, SWNENENE	ALLEN
15-001-27038-00-00	WEST RIGGS	45B	9-24S-18E, NENE	ALLEN
15-001-27258-00-02	WEST RIGGS	25B	9-24S-18E, NENE	ALLEN
15-001-27261-00-02	WEST RIGGS	30B	9-24S-18E, SESWNENE	ALLEN
15-001-27264-00-03	WEST RIGGS	40 A	9-24S-18E, NESENE	ALLEN
15-001-27270-00-00	WEST RIGGS	51-B	9-24S-18E, NWSWSENE	ALLEN
15-001-27280-00-00	WEST RIGGS	77-B	9-24S-18E, SENENWNE	ALLEN
15-001-28337-00-00	THORNTON	16 N	9-24S-18E, SESESE	ALLEN
15-001-28340-00-00	THORNTON	16R	9-24S-18E, SWSESE	ALLEN

CERTIFICATE OF SERVICE

26-CONS-3006-CPEN

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of first class mail and electronic service on 07/03/2025.

NANCY BORST
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
nancy.borst@ks.gov

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/S/ KCC Docket Room
KCC Docket Room